

ORIGINAL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FILED
IN CLERK'S OFFICE
US DISTRICT COURT

★ JUN 2 2015

UNITED STATES OF AMERICA,

BROOKLYN OFFICE

Plaintiff,

-against-

Case No. 13-CR-948(JMF)

CV 15 3848

HONG HONG,

COGAN, J.

Defendant-Petitioner.

RELIEF SOUGHT

NOW COMES Hong Hong, hereinafter Petitioner, defendant in the above captioned case, and moves this Honorable Court for an order that certain property seized from Petitioner, and any other personal belonging that was taken from him, be returned back to Petitioner.

GROUND FOR RELIEF

Petitioner asserts that he is the owner of the property that is listed in the schedule already filed with the Court on 01/14/2015 as Document 435, which Petitioner are incorporating to this notion as Exhibit 1, just adding the Check Account No. 2650016914 of East West Bank, of Brooklyn, New York, as well as a car Infiniti 2009, VIN JNRAS18W39M154124, Licence Plate No. FTX6487 of New York State. This property was seized from Petitioner on December 10, 2013, in the timeframe between 5:00 AM and 5:00 PM, at the premises knowns as 152-10 Peck Ave., Flushing, New York, in the Eastern District of New York.

The Petitioner is entitled to have return to him the property listed in the attached schedule, pursuant to the exclusionary rule adopted by the courts of the United States to protect the Fourth Amendment rights of the Petitioner and persons similarly situated, and according to the procedures set out in the Rules 12(b)(3)9c) and 41(g) of the Federal Rules of Criminal Procedure, and furthermore, because the Petitioner is entitled to lawful possession of such property and because the Government has no legitim at the property should be returned to him.

Dated: April 6, 2015

Very Respectfully Submitted,



Hong Hong
Pro se litigant
Reg. No. 69682-054
Moshannon Valley C.C.
555-I GEO Drive
Philipsburg, PA 16866

EXHIBIT 1

152-10 Peck Ave. Flushing, NY

- 1 Red Omega bag with empty packaging and receipt
- 1 Nike shoebox containing miscellaneous cardstock
- 1 California driver license bearing name "Ting Ting"
- 1 Macy's bag containing empty cigarette boxes
- 1 Green notebook with miscellaneous notes
- 1 Small notepad with miscellaneous writing
- 8 T-Mobile cards
- 7 Rolls of tipper foil – black and silver in color
- 2 East West bank slips – account number xxxx xxx 6914
- 1 USPS delivery notification
- 1 MSR 606 Encoder A612060902
- 4 Green dot cards
- 9 Miscellaneous gift cards
- 3 Miscellaneous business cards
- 1 Notebook
- 4 Miscellaneous receipts
- 1 Wallet
- 1 Tazor
- 2 Mini CDs
- 1 Mini 600
- 1 Mini X3 skimmer
- 1 TP link wireless router
- 1 Motorola modem
- 1 Sony cell phone
- 1 Iphone
- 1 Buffalo air navigator
- 2 4 GB thumb drives
- 3 Miniature CDs
- 1 500 GB C-Gate hard drive
- 1 Mac Book Pro
- 1 Black Desktop computer
- 2 Embosser machines
- 1 Macy's bag containing numerous empty shopping bags
- East West Bank Checking Account No. 2650016914
- 2009 Infiniti car, VIN JNRAS18W39M154124, Plate No. FTX6487 _NYS-

HONG HONG
Reg. No. 69682-054
M.V.C.C. - UNIT C
555-I GEO Drive
Philipsburg, PA 16866

BY LEGAL MAIL

April 6, 2015

Clerk of Court
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Hong Hong
13-CR-949(JMF)

Dear Clerk:

Please, find enclosed my Motion For Return Of Seized Property Pursuant to Rule 41(g) Federal Rules Criminal Procedure, which I would like you to file with this Honorable Court.

Please, provide the Government with a copy of such motion, to comply with the Local Rules to serve copy of any document to all parties involved in my case.

Thank you very much, in advance, for your attention in this matter.

Very Respectfully Submitted,



Hong Hong

Cc: AUSA
File